

CORRES. CONTROL
OUTGOING LTR. NO.

DOE ORDER # 4700.1

05-RF-00149

DIST.	LTR	ENC
DIETER, T.J.		
FERRERA, D.W.	X	
LINDSAY, D.C.		
LONG, J.		
LYLE, J.L.		
MARTINEZ, L. A.		
PIZZUTO, V.M.		
SHELTON, D.C.		
SPEARS, M.S.		
TUOR, N. R.		

BEAN, C.		
DECK, C.		
FOSS, D.		
FRANCIS, M.		
FREIBOTH, C.		
GEIS, A.		
GIBBS, F.	X	
HUMISTON, T.		
KNAPP, S.		
LAVORATO, K.		
LINSINBGLER, H.		
MYERS, K.		
NESTA, S.	X	X
NORTH, K.		
OMAN, K.		
PLAPPERT, R.		
PRIMROSE, A.		
RICHARDELLA, R.		
SNYDER, D.P.		
SWARTZ, J.M.	X	X
WARD, D.A.	X	X
WIEMELT, K.		
SILLS, S.		
SHULER, K.		

CORRES. CONTROL	X	X
ADMIN RECD/T130G	X	X
TRAFFIC		
PATS/130		

CLASSIFICATION:	
UCNI	
UNCLASSIFIED	
CONFIDENTIAL	
SECRET	
AUTHORIZED CLASSIFIER	
SIGNATURE:	

Date:

IN REPLY TO RFP CC NO.:

ACTION ITEM STATUS:

☐ PARTIAL/OPEN

☐ CLOSED

LTR APPROVALS:

ORIG. & TYPIST INITIALS:

SMN:pvt

RF-46469(Rev. 9/94)



MAR - 3 2005

05-RF-00149
05-DOE-00084

Mr. Steven H. Gunderson
Rocky Flats Cleanup Agreement Project Coordinator
Colorado Department of Public Health and the Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

CLOSURE DESCRIPTION DOCUMENT FOR CLOSURE OF RCRA PERMITTED CONTAINER
STORAGE UNIT 440.1 IN BUILDING 440 - SMN-012-05

Dear Mr. Gunderson:

Pursuant to the Rocky Flats RCRA Part B Permit (June 1997), Kaiser-Hill Company, L.L.C. and the United States Department of Energy, Rocky Flats Field Office (DOE, RFPO) are submitting this Closure Description Document for the RCRA Permitted Container Storage Unit 440.1 in Building 440, which is anticipated to begin in April 2005.

The Closure Description Document contains a description of the system to be closed, the selected method of closure, the types of contamination to be addressed and the schedule for closure activities. We request approval of the Closure Description Document within 30 days of receipt.

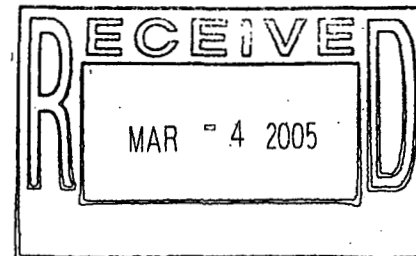
If you have any questions, please contact Stephen Nesta of Kaiser-Hill Remediation, Industrial D&D, & Site Services (RISS) at 303-966-6386.

SMN/pvt 2/9/05

Stephen Nesta Date
Environmental Manager
Remediation, Industrial D&D, & Site
Services
Kaiser-Hill Company, L.L.C

Joseph A. Legare 2-23-05

Joseph A. Legare Date
Director
Project Management Division
Rocky Flats Project Office
U.S. Department of Energy



ADMIN RECORD

IA-A-002557

**Closure Description Document
For RCRA Permitted Container Storage Unit 440.1,
Building 440**

U.S. Department of Energy
Rocky Flats Environmental Technology Site
EPA ID No. CO7890010526

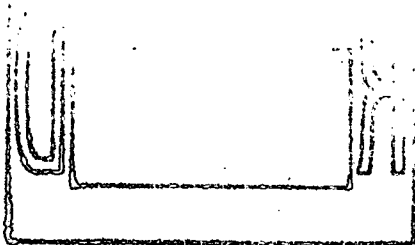


TABLE OF CONTENTS

1.0	INTRODUCTION	1
1.1	Purpose and Scope	1
1.2	Unit Closure Notification and Schedule	1
1.3	Facility Contacts	1
2.0	METHOD OF CLOSURE AND PERFORMANCE STANDARD	1
3.0	SYSTEM DESCRIPTION AND WASTE CHARACTERIZATION	2
4.0	SPECIFIC CLOSURE ACTIVITIES	2
4.1	Waste Inventory Removal	3
4.2	Establishment of System Boundaries and Scope of Removal	3
5.0	DISPOSITION OF CLOSURE WASTES.....	3
6.0	SOIL CONTAMINATION EVALUATION AND POST-CLOSURE CARE	3
7.0	RECORDKEEPING	3
8.0	AMENDMENT OF THE CLOSURE DESCRIPTION DOCUMENT	3
9.0	REFERENCES	4

1.0 INTRODUCTION

1.1 Purpose and Scope

Part X of the Rocky Flats Environmental Technology Site's (RFETS or Site's) RCRA Part B Permit, CO-04-06-23-01 addresses closure of permitted treatment units. Closure of the treatment unit is subject to the Closure Plan, as described in Part X and to a subsequent Closure Description Document (CDD) that identifies the portions or sections of the Closure Plan that are applicable to the specific permitted unit closure requirements.

This CDD applies to RCRA Container Storage Unit 440.1, Rooms 112, 113, 120, 123, 123A, 123B, 105, 106, 107, 107A, 114, 141 and the outside staging area. RCRA hazardous waste was stored in these locations until the containers were WIPP characterized and prepared for offsite shipment. WIPP characterization includes Head Gas Sampling, Gas Generation Testing, Repack in some cases and Non-Destructive Assay. Closure of building portion of this unit will be conducted under the "Debris Rule" Treatment and closure of the staging area outside of the building will be under an administrative clean closure.

1.2 Unit Closure Notification and Schedule

The Colorado Department of Public Health and Environment (CDPHE), Hazardous Materials and Waste Management Division is hereby notified of the Site's intent to close the unit identified in Section 3.0. The submittal of this notification is at least 45 days prior to the beginning of closure activities. Closure activities for this unit are expected to begin March 31, 2005. The identified closure activities are expected to be completed within 180 days.

Within 30 days after completion of closure activities a summary report will be submitted to CDPHE containing details about the closure of this portion of the unit.

1.3 Facility Contacts

The contacts for closure activities at RFETS are:

Environmental Manager	Director
Remediation, Industrial D&D, & Site Services Kaiser-Hill Company, L.L.C Golden, CO 80403-8200 (303) 966-6386	Project Management Division Rocky Flats Project Office U.S. Department of Energy Golden, CO 80403-8200 (303) 966-2282

2.0 METHOD OF CLOSURE AND PERFORMANCE STANDARD

Permitted Hazardous Waste Container Storage Area, Unit 440.1 (inside building 440), described herein will be closed using the Unit Removal in Conjunction with Debris Rule Treatment, described in the Site's RCRA Permit at Part X.D.2.a. Closure will be conducted by an Alternative Treatment Standard for Hazardous Debris, as denoted in Table 1 of 6 CCR 1007-3, Section 268.45, to meet the standard for a "clean debris surface." The staging area of unit 440.1, outside of the building, will be closed using Clean Closure Option 1 – Unit Review and Inspection, described in the Site's RCRA Permit at Part X.D.1.a.

3.0 SYSTEM DESCRIPTION AND WASTE CHARACTERIZATION

Unit 440.1, Building 440 is located in the southwest area of the Industrial Area of the Site. Building 440 is a single story engineered metal structure. The building

was built in 1970 and the early mission was non-nuclear modification of rail cars, trucks, tractors, and trailers to support safe and secure transport of nuclear materials. The Modification Center mission ended in 1994, and in 1997 the facility began waste management operations. The unit was permitted in June 1997; however, the first RCRA-regulated waste was not stored inside the building until January 1998. In 2001 an addition was built on the eastside of the existing building that includes two Transuranic Package Transporter (TRU PAC) II loading bays and locations to stage waste containers and prepare them for shipping. The building supports the Site as a storage, staging, shipment, characterization and repackaging facility for various waste containers.

The main purpose for each room in the building is described below:

Room 112 – container storage, feed for SuperHenc (non-destructive assay platform) and feed for Head Space Sampling

Room 113 – permacon operations for Head Space Sampling

Room 120 – container storage and feed for repack operations

Rooms 123, 123A, and 123B – Repack Operations

Room 105 – general container storage and shipping and receiving operations

Room 106 – container storage area and Gas Generation Testing

Room 107, 107A - container storage area

Room 114 – container storage

Room 141. – container storage, certification area, WIPP loading, IPAN Operations (non-destructive assay platform and Non-Destructive Testing on WIPP vessels

Outside Staging Area – staging area for loaded TRU PAC II vehicles

Although the unit was permitted to store liquids, the maximum amount of liquids store in a container was limited by the building's authorization basis to less than 4 liters. Containers with liquids (identified by Real-Time-Radiography) were stored in Rooms 105, and 120, where the floor was covered with an epoxy coating. If containers with liquid were stored in other rooms, the containers were placed in pans. Throughout the history of Unit 440.1, no hazardous waste was spilled or released onto the floor. However, the majority of TRU mixed waste sludge drums with integrity issues (pinhole breaches) were stored in this building. None of these containers ever had a release of waste to the building. If containers were identified during weekly and enhanced inspections, the drum(s) were overpacked and eventually repacked for offsite shipment.

The EPA waste codes approved for this unit D001-D043, F001-F009, F027, F039, P001-P205, and U001-U404. However, a review of WEMS shows that only waste with the following codes were stored in this unit D001-D011, D018, D019, D022, D027-D029, D032-D035, D039, D040, D043, F001-F003, F005-F007, F009, P016, P030, P098, P099, P106, U002-U004, U027, U031, U044, U077-U080, U103, U108, U112, U113, U123, U154, U159, U160, U161, and U188.

A review of the inspection records, spill response records, ECATS, and other site records indicate that there was no spills or releases at this unit.

4.0 SPECIFIC CLOSURE ACTIVITIES

Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions will be developed prior to start of closure activities. These

instructions will be developed in accordance with applicable RFETS policies and procedures.

4.1 Establishment of System Boundaries and Scope of Closure

The boundaries for the RCRA container storage Unit 440.1 consists of Rooms 105, 106, 107, 107A, 112, 113, 114, 120, 123, 123A, 123B, and 141. These areas will be sprayed with a water and surfactant solution. The water will be collected, analyzed for disposal, and managed at the appropriate Site water management unit. A professional engineer, to ensure a clean debris surface is met, will inspect the floor and any pans in unit 440.1. If a clean debris surface is obtained, the floor and pans will be disposed of as non-routine sanitary waste or low-level waste depending on the radiological contamination.

The outside staging area was only used for the staging of loaded TRU PAC II vehicles prior to transportation. Due to the nature of the TRU PAC II containers there was no potential for a release of waste to the staging area floor. Therefore, this portion of the unit will be closed administratively under Clean Closure Option 1 – Unit Review and Inspection.

5.0 DISPOSITION OF CLOSURE WASTES

Decontamination water will be collected for sampling, transfer and management in one of the Site's water management units.

6.0 SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE

This container storage unit has maintained an operating history (e.g., RCRA inspection logs, ECATS and occurrence reports) that indicates there have been no spills or releases to the environment as a result of waste managed activities in this unit. The closure activities for this unit will not impact the soils surrounding Unit 440.1. Therefore, soil contamination will be evaluated as part of the building demolition and environmental restoration activities conducted under RFCA. Post-closure care activities are not necessary as part of the closure for this treatment unit.

7.0 RECORDKEEPING

The following closure records will be maintained on Site during closure activities and at a federal repository for a minimum of 30 years following the report of closure:

- Work instructions used to conduct closure activities and documentation verifying closure activities were conducted in accordance with the RCRA Permit and this Closure Description Document.
- Record of any sampling activities

8.0 AMENDMENT OF THE CLOSURE DESCRIPTION DOCUMENT

In conducting closure activities, unexpected events that are identified during implementation of closure activities may require an amendment to this Closure Description Document. Modifications to this Closure Description Document will be made in accordance with applicable regulations.

9.0 REFERENCES

1. Code of Colorado Regulations, Vol. 6, No. 1007-3.
2. Rocky Flats Environmental Technology Site RCRA Permit, Part X: Closure, effective 6/23/2004.